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CHEVRON CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATTO IYELA GBARABE,

Plaintiff,

v.

CHEVRON CORPORATION,

Defendant.

Case No. 14-cv-00173-SI

**STIPULATION AND [PROPOSED]
ORDER RE: CHEVRON'S RESPONSE
TO PLAINTIFF'S AMENDED CLASS
DEFINITION**

1 Pursuant to Local Rules 6-2 and 7-12, plaintiff Natto Iyela Gbarabe and defendant
2 Chevron Corporation enter the following stipulation:

3 Whereas, the Court held a Case Management Conference on September 30, 2016;

4 Whereas, the Court entered a Minute Entry concerning the Case Management Conference
5 on October 3, 2016 (ECF 192);

6 Whereas, the "Summary" in the Minute Entry states that "Plaintiff shall produce the
7 following items by 10/7/16: 1) privilege logs, 2) amend[ed] class definition, 3) supplemental
8 responses to interrogatories re: 'verbal opinion as expressed by Verde.' Defendant may file its
9 response to the supplemental interrogatory responses by 10/21/16";

10 Whereas, consistent with the discussion at the CMC, the parties believe that the final
11 sentence should state, "Defendant may file its response to the amended class definition by
12 10/21/16"; and

13 Whereas, the parties have met and conferred regarding this issue.

14 Subject to the Court's approval, the parties stipulate to the following:

15 1. The final sentence of the Minute Entry Summary is amended to state: "Defendant
16 may file its response to the amended class definition by 10/21/16."

17
18 Dated: October 19, 2016

JONES DAY

19 By: /s/ Robert A. Mittelstaedt
Robert A. Mittelstaedt

20 Counsel for Defendant
21 CHEVRON CORPORATION

22
23 Dated: October 19, 2016

PERRY & FRASER

24 By: /s/ Neil Fraser
Neil Fraser

25 Counsel for Plaintiff
26 NATTO IYELA GBARABE

SIGNATURE ATTESTATION

I hereby attest that concurrence in the filing of this document has been obtained from all persons whose signatures are indicated by a “conformed” signature (/s/) within this e-filed document.

Dated: October 19, 2016

JONES DAY

By: /s/ Robert A. Mittelstaedt

Robert A. Mittelstaedt

Counsel for Defendant
CHEVRON CORPORATION

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

The Honorable Susan Illston

NAI-1502184099v1